

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Case No. 2:23-cv-00454-JRG-RSP
(Lead Case)

COBBLESTONE WIRELESS, LLC

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY, ARUBA NETWORKS, LLC

Defendants.

Case No. 2:23-cv-00457-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR HEARING ON DEFENDANTS' MOTION TO STAY
PROCEEDINGS PENDING *INTER PARTES* REVIEW
AND *EX PARTE* REEXAMINATION**

Defendants Cisco Systems, Inc., Hewlett Packard Enterprise Company, and Aruba Networks, LLC (collectively, "Defendants") respectfully request a hearing on their Motion to Stay Proceedings Pending *Inter Partes* Review and *Ex Parte* Reexamination ("Motion to Stay"). Dkt. No. 52. Counsel for Defendants conferred with Counsel for Plaintiff. Plaintiff does not believe a hearing on Defendants' Motion to Stay is necessary, but defers to the Court.

Defendants' Motion to Stay is fully briefed and ripe for hearing. Dkt. Nos. 52 and 56-58. Further, on September 24, 2024, the United States Patent and Trademark Office ("USPTO") granted *inter partes* review of U.S. Patent No. 7,924,802 (the "'802 Patent") – the only patent-in-

suit in this case – on all grounds requested by Defendants. Dkt. No. 63. Also, on September 10, 2024, Samsung Electronics America, Inc.’s (“Samsung”) petition requesting *inter partes* review of claims 1-10, 13-14, 17, 21-25 of the ’802 Patent was granted by the USPTO and all grounds were instituted. *Id.* Lastly, the USPTO also granted an *ex parte* reexamination filed by Unified Patents LLC, challenging claims 1-15 and 17-23 of the ’802 Patent on June 13, 2024. *Id.*

A hearing will allow the parties to address by oral argument any issue necessary for the Court to determine whether this matter should be stayed awaiting the results of *inter partes* review and *ex parte* reexamination involving the only patent-in-suit in this case and prevent the parties from potentially incurring significant litigation costs on issues that may be resolved following such reviews and examination.

For all these reasons, Defendants respectfully request a hearing on their Motion to Stay.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on October 16, 2024.

/s/ *Kyrie K. Cameron*
Kyrie K. Cameron

CERTIFICATE OF CONFERENCE

The undersigned certifies that pursuant to Local Rule CV-7(h), counsel for Defendants met with counsel for Plaintiff on October 15, 2024.

/s/ *Kyrie K. Cameron*
Kyrie K. Cameron